



**Little Tokyo Community Council**  
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May 2, 2018

## **RE: MTA Board Action on WSAB Northern Alignments Alternatives**

Dear Board Members of the Metropolitan Transportation Authority,

As the Metropolitan Transportation Authority (MTA) Board makes the decision as to which of the eight (8) route alternatives for the West Santa Ana Branch (WSAB) Transit Corridor Line are carried forward for the Draft Environmental Impact Review, on behalf of the Little Tokyo Community Council, we want to state our **strong opposition** for the original Northern alignment options (Routes A, B, C, and D), as well as **strong opposition for Route Alternative F** from the new Northern Alignment options.

The Little Tokyo Community Council is the 501(c)(3) community coalition of businesses, residents, cultural, community, and religious institutions, and other vested stakeholders in the Little Tokyo community. LTCC represents the unified voice and fights for the best interests of historic Little Tokyo – a community that at 134 years old is the second oldest neighborhood in Los Angeles, and one of three remaining historic Japantowns in the nation.

At the April 24<sup>th</sup>, 2018 meeting of the Little Tokyo Community Council, the LTCC Board and General Membership voted and approved the motion that LTCC:

- Remains opposed to the original four Northern Alignments (Routes A-D)
- Remains opposed to anything at-grade or aerial on Alameda and Vignes
- Opposes Route F of the new Northern Alignments, and opposes the further study of Route F
- Supports the further study of Route Alternatives E, G, and H (with the condition that H is studied as a fully-realized line that connects to the Red/Purple Line by extending the rail line in lieu of the Division 20 project) from the new Northern Alignments options

We want to thank the MTA Board and WSAB staff for listening and responding to the vociferous public comments and opposition to the four original alignments from the Little Tokyo and Downtown Los Angeles communities. These four alignments would have detrimental and destructive impacts to the Little Tokyo neighborhood and our stakeholders, and we continue today to be strongly opposed to anything at-grade or aerial on Alameda or Vignes. We continue to urge the MTA Board to **not** approve any of the original four Northern alignments proposed for further study under the Draft Environmental Impact Review (DEIR) process.



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We were pleased and grateful to see that the second set of route alternatives presented in the new Northern Alignments addressed many of our concerns and suggestions, as stated in our June 2017 communications to Metro regarding the original Northern Alignments. Having worked with Metro for the last 15 years, it is refreshing and affirming to see Metro evolve in its communication and response to communities, and we are appreciative of these efforts.

However, among these four new Route Alternatives, one of the alignments stands out to our community as particularly harmful and impactful to Little Tokyo – in particular, our stakeholders east of Alameda on and around Vignes St. The Little Tokyo Community Council stands with our Vignes St. stakeholders (Nishi Hongwangji Buddhist Temple, Fukui Mortuary, and Upper Crust Enterprises), the other east of Alameda stakeholders such as Maryknoll/St. Francis Xavier Japanese Catholic Church and residents from Mura, the Little Tokyo Business Association, and other Little Tokyo community members in **opposing Option F (Alameda/Center)**, and its inclusion in the DEIR study.

**[[reasons]]**

The Little Tokyo Community Council and Little Tokyo community are open to the further study of the three remaining routes from the new Northern Alignments – Route Alternatives E, G, and H (with the caveat that H should be studied as a fully connected route via the Red/Purple Line). Throughout April, LTCC conducted a series of community meetings and discussions with stakeholders on and east of Alameda, with businesses, and with the Little Tokyo community through a community forum, as well as within our own committees, general membership, and LTCC Board. These meetings hosted a wide array of the many different Little Tokyo stakeholders – church and temple members and leaders, residents, business owners, representatives from the different community and cultural organizations, and various community leaders. In these meetings, we found the by and large, our community is worried about utility construction (and pre-construction work such as utility relocation) in Little Tokyo – even if the rail line is underground, opposed to further traffic impacts, and worried about the gentrifying impacts of yet another rail line through Little Tokyo – namely, rising land value leading to higher rents, speculative development, property flipping, further displacement of small and legacy businesses, and new developments out of scale and character motivated by or connected to the transit-oriented development at each station. Many community members also opined that through the Metro Regional Connector, Little Tokyo's transit access needs would be met, and the costs to our community and stakeholders outweigh any benefits that another station and rail line would bring.

While some of our stakeholders – namely, a few businesses and Maryknoll/St. Francis Xavier Japanese Catholic Church – voiced support for Route Alternative E (Alameda Underground), the majority consensus from Little Tokyo stakeholders was in favor of Alternative G (Downtown Transit Core). The primary reasoning for this support is that Route Alternative G keeps further construction, traffic, and gentrification impacts away from Little Tokyo, still provides access to the line via a connection from the Regional



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Connector, and would be a better project for Downtown by connecting to the Transit Core and a major hub for jobs, entertainment, and local tourism.

There was also support for Route Alternative H (Arts District/6<sup>th</sup> St.) for many of the same reasons, with the caveat that this support is contingent on connecting WSAB to the Red/Purple Line so that there is access to Los Angeles Union Station rather than terminating in the Arts District with no further connections. As the Arts District continues to grow and develop, there is a tremendous need for transit access for our Arts District neighbors. We encourage Metro to evaluate Route H in the DEIR process, but as a line that connects to Union Station rather than with a terminus station at 6<sup>th</sup> Street.

LTCC's main concerns and interests:

- **We oppose four original Northern alignments (A-D)**
- **We oppose anything aerial or at-grade on Alameda and Vignes** – anything that physically bisects and splits the Little Tokyo community is unacceptable.
  - o An aerial train on Alameda would also incur **visual, noise, and air quality impacts** that cannot be mitigated through any efforts of Metro. The **visual and noise blight** in particular would deeply impact Little Tokyo, in addition to causing a physical barrier that cuts Little Tokyo in half.
  - o Aerial would also necessitate above ground construction for the entire duration of construction and pre-construction in the downtown area. Little Tokyo knows first hand as we continue to go through construction of the Regional Connector that any prolonged, ongoing construction has devastating impacts and disruption to our community and its residents, businesses, and institutions.
- **If the route is on Alameda, only a subway route is acceptable.**
- **We oppose Route Alternative F from the new Northern Alignments**
- We are concerned about construction impacting St. Xavier Francis, The Little Tokyo Galleria, Fukui Mortuary, and Nishi Hongwanji Buddhist Temple, alongside all the residents and businesses on Alameda and to its east.
  - o Construction on or near Vignes will have deep impacts and harm to the legacy businesses on First Street, the historic churches and temples in the area (St. Francis Xavier-Maryknoll, Zenshuji Buddhist Temple, and especially Nishi Hongwanji Buddhist Temple which uses Vignes as the entrance to their parking lot).
  - o Tunnel boring construction, and especially any insertion of the tunnel boring machine, needs to be kept as far away from these historic institutions as possible – so the proposal to insert the tunnel boring machine directly adjacent to Nishi Hongwanji Buddhist Temple is absolutely unacceptable to Little Tokyo.
  - o Fukui Mortuary, at 100-years old, is a historic, longstanding important community institution. Both the construction of the train, as well as its constant resurfacing to an at-grade and aerial routes would have debilitating impacts on Fukui and its ability to hold funeral services. These impacts cannot be mitigated by any means of Metro.

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- We are opposed to cut and cover construction through Little Tokyo
- We would only accept stations that are subterranean
  - o We are opposed to a station at Third and Traction, which would have disruptive and destructive impacts to both the residence Mura, as well as the over 100-year old church, St. Francis Xavier –Maryknoll.
- We do not need another station in Little Tokyo, although would accept a station south of 3<sup>rd</sup> Street.
- We are concerned about any major Transit Oriented Development that would be out of character and scale with Little Tokyo, but would be happy to discuss a situation that involves equitable development that is open and accessible to a range of residents and users. We only want development that enhances and integrates into the character of LT.

In addition to Metro's standard mitigation measures, Little Tokyo has a number of mitigations that we are seeking, should this project move forward with a route that goes through and/or affects Little Tokyo:

- **A Business Interruption Fund with the following improvements:**
  - o As we learned through construction of the Metro Regional Connector, even with mitigations and a Business Interruption Fund (BIF), business will regardless be impacted on this project, and many will be displaced. **Therefore, the current pilot of the Regional Connector BIF should be concretized into formal policy, and expanded so that it provides assistance to the entire Little Tokyo neighborhood.**
  - o This means the BIF would consider Little Tokyo as a contiguous, whole neighborhood, rather than a piecemeal approach made up of disconnected blocks. The “directly adjacent” approach of the Regional Connector BIF has rendered many of the small businesses in Little Tokyo ineligible to receive funding, despite being similarly impacted by street closures and construction.
  - o This would also mean businesses in the neighborhood's contiguous boundaries are able to apply during the entire duration of construction, starting from utility relocation until all street closures have finished.
- Money to continue the marketing of the Little Tokyo neighborhood – continuing the Go Little Tokyo program, which is currently subcontracted to CARS
- Money into a community fund to support Little Tokyo and help offset the visual, noise, and air impacts that cannot be mitigated through any other measures. We request \$50 million for this fund.
- A Legacy Business Fund – as a separate fund from the BIF - which supports the historic, legacy small businesses in Little Tokyo
- A small business incubator – given that the BIF is only for businesses that have been around for at least two years, and that the first few years for a business are the hardest, a Metro-funded small business incubator would increase retention for new small businesses.



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- Continue and increase the budget for a LT small business counselor to support businesses before, during, and after construction with both Metro programs like the BIF and other forms of support
- As with the Metro Regional Connector – a parking validation program sponsored by Metro that supports the businesses and institutions during the parking shortage and construction impacts
- Wayfaring signs, notices, and maps for pedestrians and cars to help navigate street closures, construction, and detours.
- Affordable housing and equitable development as a requirement to all joint-development TOD projects.
- Mitigations for air quality impacts
- Proper translation and interpretation for all meetings with the Little Tokyo community
- Ongoing frequent communication, coordination, and meetings with the Little Tokyo community
- Strong coordination and communication between overlapping MTA, city, regional, and development projects that all impact this area

Per our negotiations and agreements with Metro and the Downtown Regional Connector project, LTCC reminds Metro that in addition to being the second oldest neighborhood in Los Angeles, one of three remaining historic Japantowns in the United States, and one of fourteen recently state-designated California Cultural Districts, Little Tokyo was also deemed during the Findings of Facts that we are an environmental justice community, and “certain mitigations must be implemented to offset impacts”

([https://media.metro.net/board/Items/2014/07\\_july/20140717conitem61.pdf](https://media.metro.net/board/Items/2014/07_july/20140717conitem61.pdf)). This Metro document goes on to direct Metro that Little Tokyo, as an Environmental Justice community, requires “specific strategies and programs to mitigate the impacts of construction of the Regional Connector Transit Project on Little Tokyo's culturally-specific and independent businesses, cultural facilities and institutions which are central to maintaining and fostering the community's continued vitality, identity and cultural preservation.”

Our community knows all too well both the opportunities, as well as the threats, that new rail lines pose. The plan to build another new line – just a decade after the Gold Line opened, and only halfway through the construction of the Regional connector – is an inordinate amount of pressure upon our historic community that is already fatigued from transit construction. Little Tokyo is not against public transportation – but after at least fifteen years of construction from the Gold Line and the Regional Connector in the heart of our historic neighborhood, we have witnessed firsthand the impacts that rail brings even with a decently strong mitigation program, such as the displacement of historic, legacy small businesses, speculation, hyper-development, and other changes that threaten the cultural character and integrity of our historic neighborhood.

We are grateful that Metro addressed our previous concerns with the four original Northern alignments, and we are happy to support three of the new alignments (Routes E, G, & H -

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should H be provided connectivity to the Red/Purple Line) for further study. We remain more than happy to work with Metro to find a solution that benefits both the goals of the

West Santa Ana Branch line, and supports rather than disrupts Little Tokyo's future. To that end, we also are requesting any information about what other existing and future projects Metro is planning in and/or around the Little Tokyo community.

Again, LTCC supports the expansion of public transportation in Los Angeles, and greater connectivity throughout the region. We believe that Routes E, G, or H (should H be provided connectivity to the Red/Purple Line) all have the potential to benefit the region, and provide access that is needed. However, as a historic community, an ethnic enclave, and an Environmental Justice community, it is also important that Little Tokyo is not harmed during the construction of these rail lines, which is why we are **opposed** to any further study of Route Alternatives A, B, C, D, and F.

Thank you, and we look forward to working with Metro staff further on this project.

Sincerely,

Kristin Fukushima

*Managing Director, Little Tokyo Community Council*

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County Supervisor Sheila Kuehl, Third Supervisorial District

County Supervisor Janice Hahn, Fourth Supervisorial District

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